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Hazard Communication Program 2019

# Hazard Communication and Employee "Right-to-Know" Guide

This guide must be readily available in all areas where potentially hazardous chemicals are used or stored. Additional copies are available upon request to EHS. Prepared in compliance with 29 CFR 1910.1200.

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# Dartmouth College Hazard Communication Program

**Introduction:** The use of potentially hazardous chemicals is necessary in operating and maintaining an educational and research institution. Recognizing that the use of potentially hazardous chemicals poses risks to people and the environment, Dartmouth College is committed to responsibly purchasing, storing, using, and disposing all chemicals. To achieve this goal, the Dartmouth College *Hazard Communication Program* (DartHCP) provides a framework and set of guiding principles on chemical safety at Dartmouth College.

The DartHCP complies with the Occupational Safety and Health Administration's (OSHA) Hazard Communication Standard (29 CFR 1910.1200).

**Purpose:** The purpose of the DartHCP is to reduce and control the risks associated with the use of potentially hazardous chemicals to Dartmouth employees, the community, and the environment. This written program outlines the information, services, and training available at Dartmouth College on the safe use, handling, storage, and disposal of potentially hazardous chemicals.

**Scope**: This program applies to all College employees, facilities, and properties. In addition, it applies to all contract personnel working on behalf of the College.

#### Responsibilities:

#### Responsibilities of the Non-Laboratory Supervisor

- o Conduct and document an initial evaluation of their areas and activities to determine the applicability of the DartHCP to areas of responsibility.
- o Collect and organize required information on hazardous chemicals and ensure its availability to their employees working with potentially hazardous chemicals.
- o Complete the web-based "General Safety Training" course, which covers hazard communication, or attend a classroom training module (provided on request) on hazard communication. Ensure that all staff who work with or may be exposed to potentially hazardous chemicals complete or receive this training.
- O Supervisors and their qualified designees are specifically responsible to:
  - Identify chemicals that pose potential health and physical risks
  - Develop and maintain a list of hazardous chemicals used
  - Ensure availability and access to Safety Data Sheets (SDS's)
  - Organize and participate in employee training
  - Coordinate medical consultation as needed
- On an ongoing basis, supervisors are expected to provide oversight in controlling exposures to potentially hazardous chemicals by establishing standard operating procedures (SOP's).

o SOP's must, at a minimum: (1) ensure proper labeling of chemical containers, (2) outline the requirements for the use of available engineering controls and PPE (i.e., ventilation, process enclosures) and (3) consider and control exposures that may affect nearby work areas through planning and prior notification.

#### Responsibilities of the Principal Investigator (PI) or Laboratory Supervisor

- O The use of potentially hazardous chemicals in teaching and research is addressed in the Dartmouth College *Chemical Hygiene Plan* (DartCHP), and lab-specific requirements regarding chemical inventories are outlined. PI's and/or laboratory supervisors should refer to the *Chemical Hygiene Plan*.
- o All other requirements for non-laboratory supervisors apply to supervisors, faculty, and staff in Dartmouth teaching and research laboratories.

#### Responsibilities of Each Employee

- O Complete the web based "General Safety Training" course upon first arrival at Dartmouth College and every three (3) years thereafter
- o Familiarize yourself with the locations of SDS binders in your work area(s)
- o Conduct their work in a safe and responsible manner according to established SOP's and information available from container labels and SDS's
- o Protect yourself by the diligent use of required personal protective equipment
- o Protect others by considering any exposures that may affect nearby work areas
- o Protect community health and the environment by following established waste disposal practices
- o Inform your supervisor and/or EHS of apparent or potential safety and health hazards

#### Responsibilities of Contractors and Project Managers

- Before beginning work, contractors working for Dartmouth College are required to provide the Project Manager with copies of SDS's for all chemicals to be used while working at Dartmouth.
- o The Project Manager is responsible for reviewing the list of chemicals and SDS's to identify chemicals that may pose potential hazards and then notifying EHS. The Project Manager is also responsible for planning and coordinating advance notification of areas that may be affected.
- o The Project Manager is responsible for providing copies of Dartmouth College's sitespecific SDS's and the DartHCP to all contractors under their management.
- O The contractor is required to post signs, barricades, and other forms of warning while chemicals are in use. The Project Manager is responsible for ensuring that the contractor(s) take reasonable and prudent precautions when using chemicals, such as ventilation, off-hours scheduling, etc. The Project Manager is also responsible for ensuring that the contractor removes all their unused and waste chemical products.

#### Responsibilities of Environmental Health and Safety (EHS)

Oversee the development and implementation of the DartHCP at institutional and departmental levels.

- o Assist departments and supervisors in the interpretation and implementation of this policy
- o Provide employee training on the policy
- o Provide technical advice as needed to identify, evaluate, and control potential chemical hazards
- o Make recommendations on resource commitments necessary to ensure the viability of the program
- o Maintain necessary records to ensure OSHA compliance

#### Dartmouth College Hazard Communication Program (DartHCP) Components:

The DartHCP consists of three key components:

- o Identification of hazardous chemicals
- o Availability and maintenance of Safety Data Sheets and other forms of warning i.e. labels
- o Employee training

#### **Identification of Hazardous Chemicals:**

An inventory of chemicals must be prepared and maintained. This is done by using existing purchasing information, supplemented by an audit of products in use. Supervisors must inform employees of this inventory and its location.

From the chemical inventory, potentially hazardous chemicals must be identified. SDS's must be obtained for each hazardous chemical. Attention must be given to the following considerations:

- ✓ Quantity of the chemical used
- ✓ Physical properties of the chemical
- ✓ Potency and toxicity of the chemical (both acute and chronic)
- ✓ How the chemical is used
- ✓ Available controls (engineering, PPE, etc.)

Hazards associated with non-routine tasks must also be identified by supervisors and communicated to employees.

#### Hazard Information at the Work Site:

#### Labels

o Labels on chemical containers provide an immediate source of information on the hazards associated with the chemical. Under the Hazard Communication Standard, chemical manufacturers, distributors, and importers are required to use labels that include pictograms<sup>1</sup>, a signal word, hazard and precautionary statements, the product identifier, and supplier identification.

<sup>&</sup>lt;sup>1</sup>See page 11 for pictogram chart

### **SAMPLE LABEL**

#### **PRODUCT IDENTIFIER**

CODE

**Product Name** 

**SUPPLIER IDENTIFICATION** 

**Company Name** 

Street Address

City State
Postal Code Country
Emergency Phone Number

**PRECAUTIONARY STATEMENTS** 

Keep container tightly closed. Store in cool, well ventilated place that is locked.

Keep away from heat/sparks/open flame. No smoking.

Only use non-sparking tools.

Use explosion-proof electrical equipment.

Take precautionary measure against static discharge.

Ground and bond container and receiving equipment.

Do not breathe vapors.

Wear Protective gloves.

Do not eat, drink or smoke when using this product.

Wash hands thoroughly after handling.

Dispose of in accordance with local, regional, national, international regulations as specified.

In Case of Fire: use dry chemical (BC) or Carbon dioxide (CO<sub>2</sub>) fire extinguisher to extinguish.

First Aid

If exposed call Poison Center.

If on skin (on hair): Take off immediately any contaminated clothing. Rinse skin with water.

**HAZARD PICTOGRAMS** 



SIGNAL WORD Danger

**HAZARD STATEMENT** 

Highly flammable liquid and vapor. May cause liver and kidney damage.

SUPPLEMENTAL INFORMATION

Directions for use

Fill weight: Lot Number Gross weight: Fill Date:

Expiration Date:

- o For stock solutions or other in-house mixtures, the person using the chemical is responsible for proper labeling of all secondary containers. The in-house label must include:
  - ✓ Commonly Accepted Name or Chemical Formula (that corresponds to the SDS)
  - ✓ Special Warnings
  - ✓ Individual Responsible
  - ✓ Date Made
- O Containers that are "in immediate use" (and are not going to be left unattended or unused for more than eight hours, or one work shift with a duration of eight hours or fewer) are exempt from these labeling requirements.

#### Safety Data Sheets

Like labels, the Hazard Communication Standard requires that an SDS be developed for all potentially hazardous chemicals by the manufacturer or distributer. Unlike a label, SDS's contain more detailed information. An SDS is a 16-section document that provides information to workers on safe handling of a chemical. Sections 1-8 contain general information about the chemical, identification, hazards, composition, safe handling practices, and emergency control measures (e.g., firefighting). Sections 9-11 and 16 provide other technical and scientific information, such as physical and chemical properties, stability, reactivity, toxicological information, and exposure control. Sections 12-15 contain ecological, transportation, and other regulatory information as well as disposal considerations. SDS's must be available to employees who work with or may be exposed to potentially hazardous chemicals. SDS's should be obtained upon receipt of a chemical, or immediately thereafter, and prior to use.

At Dartmouth, SDS's are readily available in one of two ways. First, the college maintains a computer accessible system available through the EHS web site: <a href="https://dartmouth.bioraft.com/raft/research\_tools/SDS">https://dartmouth.bioraft.com/raft/research\_tools/SDS</a>. This system is primarily intended for chemicals found in teaching and research areas.

In departments that do not have access to the online SDS system or where proprietary products are used (i.e., custodial and maintenance), all SDS's are to be kept in a labeled binder at the work site or in a centrally accessible location.

#### **Employee Training and Information:**

All employees working with potentially hazardous chemicals must receive training and information on the provisions of the DartHCP relevant to their work. The training provided must be specific to the work to be done, yet sufficiently broad to enable the individual to apply their knowledge in similar situations.

Environmental Health and Safety has developed a web-based "General Safety" training module that provides an overview of this policy and the essential concepts in hazard communication. Additionally, EHS provides a variety of regulatory training that encompasses hazard communication as part of the curriculum. EHS is available to provide specialized or unique training as needs are identified.

In addition to the training provided by EHS, the supervisor or qualified designee must provide instruction and information specific to the employee's responsibilities and assigned tasks before they begin working with potentially hazardous chemicals. The information provided to the employee must be specific, based on established SOP's, and appropriate for the needs of the individual(s). As new chemicals are introduced into the workplace, or potential hazards change, the supervisor is responsible for ensuring that existing information and training be updated to reflect these changes. Training must be recorded on the Training Record Form, which follows this document.

The DartHCP is made available to all affected employees and contractors in a site-specific SDS binder, by request from EHS, and online at https://www.dartmouth.edu/~ehs/docs/hazcom2019.pdf

#### **Program Evaluation:**

This program will undergo an audit and periodic update.

June, 2019

# **HCS Pictograms and Hazards**

#### **Health Hazard**



- Carcinogen
- Mutagenicity
- Reproductive Toxicity
- Respiratory Sensitizer
- Target Organ Toxicity
- Aspiration Toxicity

#### **Flame**



- Flammables
- Pyrophorics
- Self-Heating
- Emits Flammable Gas
- Self-Reactives
- Organic Peroxides

#### **Exclamation Mark**



- Irritant (skin and eye)
- Skin Sensitizer
- Acute Toxicity
- Narcotic Effects
- Respiratory Tract Irritant
- Hazardous to Ozone Layer (Non-Mandatory)

## **Gas Cylinder**



Gases Under Pressure

#### Corrosion



- Skin Corrosion/Burns
- Eye Damage
- Corrosive to Metals

# **Exploding Bomb**



- Explosives
- Self-Reactives
- Organic Peroxides

#### Flame Over Circle



Oxidizers

#### **Environment**

(Non-Mandatory)



Aquatic Toxicity

#### **Skull and Crossbones**



Acute Toxicity (fatal or toxic)

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#### DARTMOUTH COLLEGE ENVIRONMENTAL HEALTH & SAFETY (EHS) GROUP TRAINING RECORD FORM

GROUP TRAINING RECORD FORM						
TOPIC:			DATE:			
LOCATION:		TIME:				
AUDIO-VISUALS USED:			INSTRUCTOR:			
BRIEF DESCRIPTION OF TRAINING:						
PRINT NAME	CAMPUS	DEPARTMENT	SIGNATURE			
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